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Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Re: Certification of CPNI Filing

EB Docket Nos. 06-TC-060 and 06-36

Dear Ms. Dortch:

Enclosed, in accordance with the Federal Communications Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our customer proprietary network information ("CPNI") compliance certificate and accompanying statement.

Sincerely,

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## **STATEMENT**

Pursuant to Section 64.2009 of the Federal Communications Commission's ("FCC's") rules and regulations, 47 C.F.R. § 64.2009, White Cloud Communications has prepared this statement outlining why its operating procedures ensure that it is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

White Cloud Communications does not disclose CPNI to any third parties or allow third party access to CPNI. Nor does White Cloud Communications engage in outbound marketing that utilizes CPNI. White Cloud Communications, however, trains its employees regarding the appropriate use of CPNI and will ensure that any employee that violates established CPNI procedures is appropriately disciplined. In addition, White Cloud Communications will maintain a record of all instances in which CPNI was disclosed or provided to third parties or in which third parties were allowed access to CPNI;

If White Cloud Communications decides to employ CPNI for outbound sales and marketing campaigns, it will:

- maintain a record of sales and marketing campaigns that used customers' CPNI;
- establish a supervisory review process regarding compliance with the CPNI rules
  with respect to outbound marketing situations and maintain records of compliance
  for a minimum period of one year;
- and require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI.

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## **CPNI Compliance Certification**

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I hereby certify, as an officer of White Cloud Communications, Inc that I have personal knowledge that, to the extent required by the rules and regulations of the Federal Communications Commission, White Cloud Communications has established operating procedures that are adequate to ensure compliance with the rules in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Attached to this Compliance Certification is a statement explaining how White Cloud Communications operating procedures ensure that it is in compliance with these rules.

Name

Title:

Date: 💹 🔗